

1 BILAL A. ESSAYLI  
First Assistant United States Attorney  
2 ALEXANDER B. SCHWAB  
Assistant United States Attorney  
3 Acting Chief, Criminal Division  
4 JONATHAN GALATZAN  
Assistant United States Attorney  
5 Chief, Asset Forfeiture & Recovery Section  
6 JAMES E. DOCHTERMAN (Cal. Bar No. 256396)  
Assistant United States Attorney  
7 Asset Forfeiture & Recovery Section  
312 North Spring Street, 11th Floor  
8 Los Angeles, California 90012  
Telephone: (213) 894-2686  
9 Facsimile: (213) 894-6269  
10 E-mail: James.Dochterman@usdoj.gov

11 Attorneys for Plaintiff  
12 UNITED STATES OF AMERICA

13 UNITED STATES DISTRICT COURT  
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
15 WESTERN DIVISION

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 VIRTUAL CURRENCY AND  
\$2,061,517.68 IN U.S. CURRENCY,

20 Defendants,

21 Concord Music Group, Inc. and Dish  
22 Network Corporation,

23 Claimants.  
24

Case No. 2:25-cv-04631-SB-MAR

**GOVERNMENT’S STATUS REPORT**

25 Plaintiff United States of America (“the government”) respectfully submits this  
26 status report pursuant to the Court’s September 12, 2025, Minute Order ordering the  
27 government to file a status report by December 2, 2025. Dkt. 24. A status conference is  
28 scheduled for December 12, 2025, at 8:30 a.m.

1 The government responds as follows:

2 Notice to Mr. Gallyamov

3 Unanticipated funding lapses delayed translation and transmittal of notice to the  
4 Russian Federation. Once that situation was resolved, the Office of International Affairs  
5 translated and transmitted the notice to the designated representative of the Russian  
6 Federation on November 20, 2025, pursuant to the applicable Mutual Legal Assistance  
7 Treaty. *See generally* Government’s Status Report (August 20, 2025), Dkt. 27 at 5. If the  
8 deadlines for filing claims and answers with this Court are determined based on the  
9 Office of International Affairs’ November 20, 2025, transmission of the notice to the  
10 Russian Federation, Mr. Gallyamov’s claim deadline would be due 35 days thereafter,  
11 *i.e.*, Monday, December 29, 2025<sup>1</sup> and the answer would be due 21 days after the claim  
12 is due, *i.e.*, January 20, 2026. *See* Supp. Rule G(4)(b)(ii), G(5)(a)(ii)(A) and G(5)(b).  
13 However, the government may also more accurately calculate applicable deadlines based  
14 on the Russian Federation’s acknowledgement of its receipt and transmission of the  
15 notice to Mr. Gallyamov at the addresses set forth in the MLAT request. If Mr.  
16 Gallyamov does not file a timely claim, the government plans to seek a default against  
17 his interests.

18 Domestic Potential Claimants

19 On October 17, 2025, Concord Music Group, Inc. filed a timely claim and  
20 amended claim in the amount of \$3,285,000.00, and answer on November 7, 2025. Dkts.  
21 33, 40, 41. Generally, Concord Music Group, Inc. asserts that it is an innocent owner of  
22 fees and proceeds traceable to 191.54390 Bitcoin, *i.e.*, part of the defendant Virtual  
23 Currency, paid to fraud scheme operators on December 16, 2022. *Id.*

24  
25 \_\_\_\_\_  
26 <sup>1</sup> The government notes that under Supp. Rule G, the claim filing deadline is thirty-five  
27 days from notice, *i.e.* Thursday, December 25, 2025 (the Christmas holiday), and  
28 December 26, 2025, is a court holiday. *See* “Court Holidays – 2025” available at  
<https://www.cacd.uscourts.gov/clerk-services/court-holidays>. The claim filing deadline  
thus moves to the next available non-weekend day, Monday.

1 On October 17, 2025, Dish Network Corporation filed a timely claim to a specific  
2 amount of BTC (currently under seal), and answer on November 7, 2025. Dkts. 35 and  
3 38. Dish Network Corp. also filed a petition. Generally, Dish Network Corp. asserts that  
4 it is a ransomware attack victim and innocent owner that purchased and paid Bitcoin as  
5 ransom and traceable fraud proceeds to “Black Basta” on March 17, 2023. *Id.*

6 The government previously stipulated to extend time for potential claimant Credit  
7 Control Corporation to respond to the initial complaint. Credit Control Corp. did not file  
8 a timely claim on October 17, 2025; however, the government understands that Credit  
9 Control Corp. may file a petition.

10 The government recently became aware of an additional corporate domestic  
11 potential claimant, to which the government sent direct notice. The corporate potential  
12 claimant’s claim deadline expired on November 26, 2025, and it instead elected to file a  
13 petition.

14 There remain no additional known domestic potential claimants warranting direct  
15 notice. The government began publication on August 19, 2025; hence, the claim filing  
16 deadline for all other potential claimants passed on October 18, 2025, and the answer  
17 filing deadline passed on November 8, 2025. *See* Supp. Rule G(5)(a)(ii)(B) and (b). As  
18 of this filing, only the two above-captioned parties have filed timely claims.

19 //

20 //

21 //

International Potential Claimants

There remain six international potential claimants for which notice and translations are in-progress, having been delayed by the unanticipated funding lapse. The government is working to determine translation funding sources and mitigate costs regarding four international potential international claimants requiring translations into German, Dutch, and Chinese (Mandarin). Based on current experience and available resources, the government anticipates that these notices may be prepared for transmittal to the Office of International Affairs in February 2026.

Dated: December 2, 2025

Respectfully submitted,

BILAL A. ESSAYLI  
First Assistant United States Attorney  
ALEXANDER B. SCHWAB  
Assistant United States Attorney  
Acting Chief, Criminal Division  
JONATHAN GALATZAN  
Assistant United States Attorney  
Chief, Asset Forfeiture & Recovery Section

/s/ James E. Dochterman

JAMES E. DOCHTERMAN  
Assistant United States Attorney

Attorneys for Plaintiff  
UNITED STATES OF AMERICA